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CARLOS GONZALEZ SOLTERO

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,
Plaintiff,
vs.
CARLOS GONZALEZ SOLTERO,
Defendant
Case No.: 23-00073 DJC
STIPULATION AND ORDER TO
CONTINUE STATUS CONFERENCE
Date: June 12, 2025
Time: 9:00 a.m.
Judge: Hon. Calabretta

STIPULATION

The United States of America through its undersigned counsel, Caily Nelson, Assistant United States Attorney, together with Attorney Dina Santos, counsel for Carlos Gonzalez-Soltero, hereby stipulate the following:

1. The Status Conference was previously set for April 24, 2025. By this stipulation, the parties now move to continue the Status Conference to June 12, 2025, at 9:00 a.m. and to exclude time between April 24, 2025 and June 12, 2025, under the Local Code T-4 (to allow defense counsel time to prepare).
 2. The parties agree and stipulate, and request the Court find the following:
 - a. A continuance is requested to continue to allow the Defense to meet with the Client, arrange for a certified Spanish interpreter to review the plea agreement, continue to review discovery, arrange for client to meet with an immigration expert, conduct investigation, and discuss a potential resolution and/or plea agreement provided by the Government.

- 1 b. Counsel for the Defendant believes the failure to grant a continuance in this
 - 2 case would deny defense counsel reasonable time necessary for effective
 - 3 preparation, taking into account the exercise of due diligence.
 - 4 c. The Government does not object to the continuance.
 - 5 d. Based on the above-stated findings, the ends of justice served by granting the
 - 6 requested continuance outweigh the best interests of the public and the
 - 7 defendants in a speedy trial within the original date prescribed by the Speedy
 - 8 Trial Act.
 - 9 e. For the purpose of computing time under the Speedy Trial Act, 18 United
 - 10 States Code Section 3161(h)(7)(A) within which trial must commence, the
 - 11 time period of April 24, 2025, and June 12, 2025, inclusive, is deemed
 - 12 excludable pursuant to 18 United States Code Section 3161(h)(7)(A) and
 - 13 (B)(iv), corresponding to Local Code T-4 because it results from a continuance
 - 14 granted by the Court at defendant's request on the basis of the Court's finding
 - 15 that the ends of justice served by taking such action outweigh the best interest
 - 16 of the public and the defendant in a speedy trial.
- 17 3. Nothing in this stipulation and order shall preclude a finding that other provisions
 - 18 of the Speedy Trial Act dictate that additional time periods are excludable from
 - 19 the period within which a trial must commence.

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1 **IT IS SO STIPULATED.**

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3 DATED: April 18, 2025

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5 Michele Beckwith
6 Acting United States Attorney

7 _____
8 /s/ Caily Nelson
9 CALEY NELSON
10 Assistant U.S. Attorney

11 DATE: April 18, 2025

12 _____
13 /s/ Dina Santos
14 DINA SANTOS
15 Attorney for Carlos Gonzalez Soltero

16 **ORDER**

17 The Court has read and considered the Stipulation Regarding Excludable Time
18 Period Pursuant to Speedy Trial Act, filed by the parties in this matter. The Court hereby
19 finds that the Stipulation, which this Court incorporates by reference into this Order,
20 demonstrates facts that provide good cause for a finding of excludable time pursuant to
21 the Speedy Trial Act, 18 U.S.C. § 3161.

22 The Court further finds that: (i) the ends of justice served by the continuance
23 outweigh the best interest of the public and defendant in a speedy trial; and (ii) failure to
24 grant the continuance would deny defense counsel the reasonable time necessary for
25 effective preparation, taking into account the exercise of due diligence.

26 Nothing in this Order shall preclude a finding that other provisions of the Speedy
27 Trial Act dictate that additional time periods are excluded from the period within which
28 trial must commence.

29 **IT IS SO ORDERED.**

30 Dated: April 21, 2025

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32 /s/ Daniel J. Calabretta

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34 THE HONORABLE DANIEL J. CALABRETTA
35 UNITED STATES DISTRICT JUDGE